

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

JANE DOE, on her own behalf, on behalf of  
her husband, John Doe, and on behalf of all  
others similarly situated,

Plaintiff,

v.

UNITEDHEALTH GROUP INC., et al.,

Defendants.

Civil Action No. 17-cv-4160 (AMD)(RML)

**NOTICE OF JOINT MOTION TO  
CONSOLIDATE**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in support of this motion, the undersigned counsel for Plaintiff Jane Doe and Defendant Oxford Health Insurance, Inc. will move this Court, before the Honorable Robert M. Levy, United States Magistrate Judge for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, pursuant to Rule 42 of the Federal Rules of Civil Procedure for an Order consolidating this case with another action, *Jane Smith et al. v. United Healthcare Insurance Company et al.*, Case No. 1:21-cv-02791-PKC-PK (E.D.N.Y.), which has just been transferred from the U.S. District Court for the Northern District of California for purposes of efficiently pursuing approval of a coordinated class settlement of both matters.

Dated: May 21, 2021

By: /s/ Jason S. Cowart

Andrew N. Goldfarb (*pro hac vice*)  
Daniel K. Amzallag (*pro hac vice*)  
ZUCKERMAN SPAEDER LLP  
1800 M Street, NW, Suite 1000  
Washington, DC 20036

Respectfully submitted,

By: /s/ Michael W. Lieberman

Christopher Flynn (*pro hac vice*)  
Michael W. Lieberman (*pro hac vice*)  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, NW  
Washington, DC 20004

Tel: (202) 778-1800  
Fax: (202) 822-8106  
agoldfarb@zuckerman.com  
damzallag@zuckerman.com

D. Brian Hufford  
Jason S. Cowart  
Nell Z. Peyser  
ZUCKERMAN SPAEDER LLP  
485 Madison Avenue, 10th Floor  
New York, NY 10022  
Tel: (212) 704-9600  
Fax: (212) 704-4256  
dbhufford@zuckerman.com  
jcowart@zuckerman.com  
npeyser@zuckerman.com

Meiram Bendat (*pro hac vice*)  
PSYCH-APPEAL, INC.  
7 West Figueroa Street, Suite 300  
PMB #300059  
Santa Barbara, CA 93101  
Tel: (310) 598-3690, x.101  
Fax: (888) 975-1957  
mbendat@psych-appeal.com

John William Leardi  
Paul Donald Werner  
BUTTACI LEARDI & WERNER LLC  
212 Carnegie Center, Suite 202  
Princeton, NJ 08540  
Tel: (609) 799-5150  
Fax: (609) 799-5180  
jwleardi@buttacilaw.com  
pdwerner@buttacilaw.com

*Attorneys for Plaintiff and the  
Putative Class*

Tel: (202) 264-2500  
Fax: (202) 628-5116  
cflynn@crowell.com  
mlieberman@crowell.com

Jennifer S. Romano (*pro hac vice*)  
CROWELL & MORING LLP  
515 South Flower Street, 40th Floor  
Los Angeles, CA 90071  
Tel: (213) 622-4750  
Fax: (213) 622-2690  
jromano@crowell.com

Megan F. Beaver (*pro hac vice*)  
CROWELL & MORING LLP  
3 Embarcadero Center, 26th Floor  
San Francisco, CA 94111  
Tel: (415) 986-2800  
Fax: (415) 986-2827  
mbeaver@crowell.com

Kelly T. Currie  
CROWELL & MORING LLP  
590 Madison Avenue, 20th Floor  
New York, NY 10022  
Tel: (212) 895-4257  
Fax: (212) 223-4134  
kcurrie@crowell.com

*Attorneys for Defendant*